

SAMPLE #2

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA.**FILED**

JUN 02 2016

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY W, DEPUTY

Ashley, Grant L.

Plaintiff(s)

vs.

CASE NO. CIV-16-443-M

University of Oklahoma

Defendant(s)

**Amended
COMPLAINT**

The Defendants, Brian Ellis, Facilities Management Director; Sue-Anna Miller, Assistant Director; Matthew Rom, Custodial and Housekeeping Manager; Pam Mitchell, Assistant Director; Devin Bartlett, Supervisor of Lloyd Noble Custodians; and Chelle Guttery, Disability Resource Center. The aforementioned names are employees and representatives of the University of Oklahoma, 660 Farrington Oval, Evans Hall #102, Norman, OK 73019. The Plaintiff, Grant Louis Ashley, began experiencing racially hostile comments and actions from his direct supervisor, Bartlett, and intimidated several formal complaints to the department's administration branch. Shortly thereafter, negative retaliatory occurrences commenced along with renewed and ongoing racially unfriendly work place environments and settings. Notwithstanding, Plaintiff Ashley's continual complaints the Defendants ignored Plaintiff Ashley's pleas and engaged in a campaign of increased retaliatory actions. The Defendant's actions matured to develop into an unfavorable and harmful atmosphere for Plaintiff Ashley's status, as both a full-time University employee as well as a full-time University student by means of but not limited to: exclusion from mandatory over-time hours offered fellow employees; reassignment of normal work station; vandalism of personal property; unannounced work site inspections; the prolonging of time-sensitive documents required by Plaintiff Ashley to receive reduced tuition; and, abrupt termination.

It is my allegations that the Defendants as representatives of the University of Oklahoma discriminated against Plaintiff Ashley and violated the Plaintiff's civil rights of protected conduct. I further profess that the Defendants created such a conspicuous campaign of negative, hardship-generating, burden-laden attack salvos that fellow employees were deterred from participating as witnesses on my behalf or reporting adverse actions aimed at themselves. I am seeking judiciary redress for financial loss, mental stress and anguish, and the academic harm and suffering I endured as a result of the University of Oklahoma's design to expose me to undesirable situations and the unfair and unequal treatments afflicted. In addition, I am seeking a trial by jury and \$ 700,000 in damages for the violation of my civil rights and the sufferings and unfair treatment I endured along with all other damages as the law and civil code would see fit.

Grant Louis Ashley
708 E. Gray St.
Norman, OK 73071
Ph. 405-701-8311

NOTE: Your signature, address and phone number must appear at the end of each pleading.